

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-1 Please provide a map or maps clearly depicting the entirety of the Olin campus, including but not limited to:

- (a) the property lines of Olin and Babson College ("Babson");
- (b) the town boundaries of both the Town of Needham ("Needham") and the Town of Wellesley ("Wellesley");
- (c) all streets (including public and private ways) on or adjacent to the Olin and Babson campuses, setting forth all such streets labeled with their names;
- (d) the location of all buildings and facilities, existing or planned, whether academic, administrative or residential, on both the Olin and Babson campuses;
- (e) the location of any and all temporary facilities for the provision of electric service on the Olin and Babson campuses, whether owned by Olin, Babson, NSTAR Electric or Wellesley Municipal Light Plant ("WMLP"), indicating specifically the current owner of such facilities; and
- (f) the planned location of any and all permanent facilities for the provision of electric service on the Olin and Babson campuses, whether owned by Olin, Babson, NSTAR Electric or WMLP, indicating specifically the planned owner of such facilities.

Please provide a clear legend and a distance scale on all such maps.

Response: **See Attachment BE-1-1A for sections (a), (b), (c), and (d).**
 See Attachment BE-1-1B for sections (a), (b), (c), and (d).
 See Attachment BE-1-1C for sections (a), (b), (c), and (d).
 See Response to BE-1-5 for sections (e) and (f).

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Witness Responsible: Stephen Hannabury

BE-1-2 Please provide a copy of the plot plan for the Olin campus.

Response: See Attachment BE-1-1.

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Witness Responsible: Stephen Hannabury

BE-1-3 Please provide a copy of the Wellesley and Needham assessors' maps for the Olin campus.

Response: Olin does not have any such maps in its possession. To the extent that such maps exist, they are equally available to NSTAR as a public record.

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Witness Responsible: Stephen Hannabury

BE-1-4 Please provide copies of all deeds for real property, whether in Needham or Wellesley, that constitute the Olin campus. Please provide book and page numbers from the applicable Registry of Deeds or other appropriate references showing where any such deeds are recorded.

Response: See Attachment BE-1-4. Recording information is reflected on the face of such deeds.

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Witness Responsible: Stephen Hannabury

BE-1-5 Please provide a copy of any and all engineering plans or drawings indicating the electric distribution facilities currently located and to be located at the Olin campus.

Response: See Attachments BE-1-5A through BE-1-5D.

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Witness Responsible: Stephen Hannabury

BE-1-6 Please provide a copy of all of Olin's property tax bills from both Wellesley and Needham since January 1, 1998.

Response: **Olin is a tax exempt institution. Some property tax bills were received and paid immediately following the purchase of the properties. See attachment BE-1-6.**

All Olin property is now exempted from property tax.

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Witness Responsible: Stephen Hannabury

BE-1-7 Please provide a copy of all contracts, agreements, memoranda of understanding, letters, correspondence or other written documentation between Olin and Babson regarding the following topics:

- (a) the procurement of utility service (including, but not limited to, electricity and gas);
- (b) easements, licenses, rights of way or leases for the placement of any facilities; and
- (c) the shared use of any associated facilities or services.

Response: (a) See Attachment BE-1-7A. Communications between Olin and Babson have been very frequent, so there may be additional responsive material. Olin will continue to review its files for such materials and provide any such material when it is located.

(b) See Attachments BE-1-7B1 and BE-1-7B2 for easements relating to utility and other services. Also note that the easement over which Olin would take permanent electric service has not yet been finalized and recorded, so it is not reflected on Attachment 1-7B. It is planned that such easement will be collocated with Olin's existing access easement through the Babson campus, along with separate portions from that easement area to the planned site of Olin's switchgear in Wellesley and to the WMLP system.

(c) See Attachment BE-1-7C

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Witness Responsible: Stephen Hannabury

BE-1-8 Please provide a copy of all contracts, agreements, memoranda of understanding, letters, correspondence or other written documentation between Olin and WMLP regarding the following topics:

- (a) the procurement of utility service (including, but not limited to, electricity, gas, water and sewer);
- (b) easements, licenses, rights of way or leases for the placement of any facilities;
- (c) the shared use of any associated facilities or services;
- (d) the construction of facilities intended to serve the Olin campus;
- (e) cost estimates relative to the cost of constructing and/or operating any associated electric facilities; and
- (f) projections of the amount of monthly and/or annual electric load at the Olin campus, including any forecast of the associated cost.

Response: (a), (b), (c) and (d) See Attachment BE-1-8A. Communications between Olin and WMLP have been very frequent, so there may be additional responsive material. Olin will continue to review its files for such material and provide any such material when it is located.

(e), (f) See Attachment BE-1-8B. Please note that calculations in these documents are based on all eight Olin College buildings being fully in use.

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Witness Responsible: Stephen Hannabury

BE-1-9 Please provide any and all estimates produced by Olin, its contractors, consultants, or engineers pertaining to its projected annual electric consumption and the cost of such services.

Response: See Attachment BE-1-8B.

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Witness Responsible: Stephen Hannabury

BE-1-10 Please provide a copy of the annual operating budgets produced by Olin since January 1, 1998.

Response: Such budgets are not made available on a public basis due to inclusion of confidential information, including salary of personnel. Although Olin is a not-profit institution, it is in competition with such institutions as MIT, WPI and others. Additionally, Olin objects to such request as not designed to yield information relevant to this proceeding.

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Witness Responsible: Stephen Hannabury

BE-1-11 Please identify the dates, locations and topics of any and all meetings between Olin and Babson concerning the subjects identified in Information Request BE-1-7 above. Please identify the names, titles and responsibilities of all attendees at such meetings for both Olin and Babson. Please provide any and all meeting minutes from such meetings.

Response: **This request is overly broad and burdensome. There have been scores of meetings, discussions and conversations concerning the subjects identified in BE-1-7. Much of the early work between the two Colleges involved property rights, easements, and shared services and facilities.**

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BE-1-12 Please identify the dates, locations and topics of any and all meetings between Olin and WMLP concerning the subjects identified in Information Request BE-1-8 above. Please identify the names, titles and responsibilities of all attendees at such meetings for both Olin and WMLP. Please provide any and all meeting minutes from such meetings.

Response: Listed below are the meetings for which we have located records. Olin will continue to review calendars and documents for additional meetings.

Any minutes for these meetings that were published are included in Attachment BE-1-8A.

May 14, 1999 – Amin Jessa, Pete McBreen, Luan Lang, Carol Colantuene and Tom Horan, BECO; Ted Schultz, Olin College; Mike Fahey, BRTA; Jim O'Grady, Hanscomb Associates; Dick Jackson, David Peduto, John Eldert and Keith Hague, Babson College and Gary Babin, WMLP.

May 19, 2000 – Richard Joyce, Gary Babin, Don Newell, WMLP; Ken Barna, WMLP Counsel; Shelley Kaplan, Associate Vice President, Planning and Facilities, Babson and Olin Colleges; Robert Davis, Karin Church, Olin Counsel; James O'Grady, Hanscomb Associates, Olin Project Manager; Stephen Hannabury, Olin College

November 2, 2000 - Richard Joyce, Gary Babin, Don Newell, WMLP; Ken Barna, WMLP Counsel; Eric Krathwohl, Olin Counsel, Robert Davis, Karin Church, Olin Counsel; Joseph McDonald, Olin College; Stephen Hannabury, Olin College

November 29, 2000 - Richard Joyce, Gary Babin, WMLP; Stephen Hannabury, Olin College

January 29, 2001 – participants not recorded

May 11, 2001 - Richard Joyce, Gary Babin, WMLP; Ken Barna, WMLP Counsel; Robert Davis, Olin Counsel; Shelley Kaplan, Babson and Olin Colleges; Jonathan Moll, Babson Counsel; Stephen Hannabury, Olin College

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June 6, 2001 – Shelley Kaplan, Babson and Olin Colleges; Unrecorded representatives from WMLP; Unrecorded representatives from Shooshanian Engineering; Stephen Hannabury, Olin College

July 20, 2001 – Gary Babin, Don Newell, WMLP; Shelley Kaplan, Babson and Olin Colleges; Eric Krathwohl, Olin Counsel; James O'Grady, Hanscomb Associates, Olin Project Manager; David Morrison, Shawmut Construction, Babson Project Manager; Peter Watt, Chris Polci, Shooshanian Engineering; Stephen Hannabury, Olin College

August 30, 2001 - Gary Babin, Don Newell, WMLP; Eric Krathwohl, Olin Counsel; David Morrison, Shawmut Construction, Babson Project Manager; Peter Watt, Chris Polci, Shooshanian Engineering; Stephen Hannabury, Olin College

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Witness Responsible: Stephen Hannabury

BE-1-13 Please provide all written documentation and correspondence between Olin and WMLP since January 1, 1998.

Response: These documents are included in Attachment BE-1-8A.

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Witness Responsible: Stephen Hannabury

BE-1-14 Please provide a copy of all bills or invoices for electricity service received by Olin from WMLP since January 1, 1998.

Response: None. While the Affidavit of Mr. Hannabury states that Olin has been receiving power from WMLP on a temporary basis, a more specific description is that Olin has no existing relationship with WMLP and that the electricity used in the portion of Olin's campus that is currently under construction or occupied on a temporary basis is received through a temporary connection with Babson under the college's general agreement to accommodate Olin during its construction period.

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Witness Responsible: Stephen Hannabury

BE-1-15 Please provide any and all cost estimates produced by Olin, its consultants, contractors or engineers comparing the cost of electricity or of electric distribution service if supplied by WMLP or NSTAR Electric.

Response: **See Attachment BE-1-8B.**

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Witness Responsible: Stephen Hannabury

BE-1-16 Please provide a copy of any written request from Olin, whether made to either WMLP or NSTAR Electric, seeking the construction and/or placement of electric facilities (both temporary and permanent) required to serve Olin. Please provide a copy of any written response from WMLP and NSTAR Electric to such a request.

Response: See Attachment BE-1-16 for correspondence between Olin and NSTAR.

See Attachment BE-1-8A for correspondence between Olin and WMLP.

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Witness Responsible: Stephen Hannabury

BE-1-17 Please provide a timeline or schedule that indicates the construction plan of Olin, the expected completion date for developing all buildings and facilities on the Olin campus, and the commencement of the academic calendar.

Response:

	Construction Period	Completion and Turnover	Occupancy
Site Development	July 1999 - June 2002	June 2002	N/A
Building D	Sept. 2000 – Mar. 2002	March 2002	June 2002
Building A	Oct. 2000 – May 2002	May 2002	June 2002
Building H-1	Oct. 2000 – Mar. 2002	March 2002	August 2002
Building C	Jan. 2001 – June 2002	June 2002	June 2002
Landscape	Sept. 2001 – July 2002	July 2002	N/A

The fifth building (H-4) will be opened July, 2004. The design process for this building has not yet begun.

The remaining three buildings will be constructed as needed.

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BE-1-18 With respect to the Olin campus, please provide the following:

- (a) the total square footage of land owned by Olin in Needham;
- (b) the total square footage of land owned by Olin in Wellesley;
- (c) the relative percentage of land owned by Olin in Needham and Wellesley, respectively, in relation to the overall Olin campus;
- (d) the total square footage of the portion of land in Wellesley on which Olin now takes receipt of its temporary electric service from WMLP;
- (e) the relative percentage of square footage identified in response to part (d) above in relation to the total square footage of the overall Olin campus;
- (f) the total square footage of the portion of land in Wellesley on which Olin intends to take receipt of its permanent electric service from WMLP; and
- (g) the relative percentage of square footage identified in response to part (f) above in relation to the total square footage of the overall Olin campus.

Please provide all data, assumptions and calculations in support of this information and identify the source(s) for all such information.

Response: (a) through (g) See Attachment BE-1-1A. See also Response to BE-1-7.

A substantial portion of Olin's real estate rights in Wellesley are under easement. It must also be noted that Olin and Babson have been swapping and transferring real estate rights since Olin's initial acquisition of the property which will constitute its campus and it is likely that such transfers will continue such that the answers to the subquestions will change – likely increasing the percentage of real estate rights of Olin in Wellesley.

The following respond to the requests regarding Olin's real property interests in Wellesley and Needham:

- (a) 3,212,878 s.f.
- (b) 60,000 s.f. (approx.)
- (c) Needham 98%; Wellesley 2%
- (d) Not applicable

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- (e) Not applicable.**
- (f) See (b) above. Although Olin uses such property rights for general access, as well as, virtually the entire indicated area is to be used for "taking" electric service.**
- (g) See (f) above.**

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Witness Responsible: Stephen Hannabury

BE-1-19 With reference to Information Request BE-1-18 above, to the extent that Olin has land rights in either the Needham or Wellesley through an easement, license, or other similar real estate conveyance in addition to, or instead of, ownership, please so indicate and respond to subparts (a) through (g) of Information Request BE-1-18 accordingly. Please provide all data, assumptions and calculations in support of this information and identify the source(s) for all such information.

Response: See Olin's Response to BE-1-7 and Attachment BE-1-7B. See also Olin's Response to BE-1-18.

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Witness Responsible: Stephen Hannabury

BE-1-20 With respect to Olin's buildings, either already constructed or to be constructed on the Olin campus, please provide the following:

- (a) the total square footage of Olin's buildings in Needham;
- (b) the total square footage of Olin's buildings in Wellesley;
- (c) the relative percentage of square footage of Olin's buildings in Needham in relation to the overall square footage of buildings on the Olin campus; and
- (d) the relative percentage of square footage of Olin's buildings in Wellesley in relation to the overall square footage of buildings on the Olin campus;

Please provide all data, assumptions and calculations in support of this information and identify the source(s) for all such information.

Response:

- (a) **Approximately 525,000 s.f.**
- (b) **Other than the permanent electric facilities to be constructed in Wellesley, Olin has no buildings in Wellesley at this time. See also, Olin's Response s to BE-1-18 and BE-1-21.**
- (c) **100%**
- (d) **See (b) above.**

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Witness Responsible: Stephen Hannabury

BE-1-21 With respect to Olin's estimated consumption of electricity, please provide the following:

- (a) Olin's total electricity load (in both energy and demand) estimated to result from consumption of electricity in Needham;
- (b) Olin's total electricity load (in both energy and demand) estimated to result from consumption of electricity in Wellesley;
- (c) the relative percentage of Olin's electricity load (in both energy and demand) in Needham in relation to Olin's overall electricity load on the campus; and
- (d) the relative percentage of Olin's electricity load (in both energy and demand) in Needham in relation to Olin's overall electricity load on the campus.

Please provide all data, assumptions and calculations in support of this information and identify the source(s) for all such information.

Response: **See Attachment BE-1-21. Initially, one hundred percent of Olin's electricity load will result from consumption in Needham. However, because of the cooperative relationship between Olin and Babson, it is possible that further real property transfers will occur. Thus, it is not unreasonable to expect that in the future Olin will have additional electricity consuming buildings in Wellesley just as Babson now has such buildings in Needham.**

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Witness Responsible: Stephen Hannabury

BE-1-22 Please describe, and provide a copy of, any planning board, zoning board, conservation commission, building, electrical, plumbing, fire department or other local approval received by Olin or its contractors from either Wellesley or Needham for the construction of its new campus. Please identify any and all local officials that have performed, or are performing, inspections of any aspect of the construction activity, including, without limitation, any aspect of the electrical wiring associated with the new buildings or the provision of temporary or permanent electrical service thereto.

Response: To the best knowledge of Olin, Olin or its contractors, have made all the requisite filings for local permits and approvals and such permits or approvals have been issued or are in the process of being finalized. In particular the wiring inspections are ongoing and nothing is final.

This request is overly broad and response to it beyond the foregoing would be unduly burdensome on Olin.

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Witness Responsible: Stephen Hannabury

BE-1-23 Please describe the arrangements that Olin has made for the provision of water service to the Olin campus, identifying the provider of such service and the location of pipes and meters associated with the provision of such service.

Response: **Water is provided by the Town of Needham.**

A new water main was constructed as an extension of the Town system to provide service to the Olin campus. It runs from the intersection of Great Plain Avenue and Olin Way, up Olin Way to the Olin Service Road, up the Olin Service Road to the end of Burrill Lane (paper street at this location), down Burrill Lane to Forest Street, and down Forest Street to Central Avenue.

The College currently connects to this main in two locations and each building is metered separately.

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Witness Responsible: Stephen Hannabury

BE-1-24 Please describe the arrangements that Olin has made for the provision of sewer service to the Olin campus, identifying the provider of such service and the location of pipes and meters associated with the provision of such service.

Response: **Sewer service is provided by the Town of Needham.**

A new sewer line was constructed to provide service to the Olin campus. It runs from the intersection of Great Plain Avenue and Olin Way, up Olin Way to the Olin Service Road, up the Olin Service Road to the base of the Great Lawn, and up the Great Lawn to the top of the Lawn.

Individual buildings are connected to this line. There are no sewer meters.

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Witness Responsible: Stephen Hannabury

BE-1-25 Please describe the arrangements that Olin has made for the provision of gas service to the Olin campus, identifying the provider of such service and the location of pipes and meters associated with the provision of such service.

Response: Gas transmission service is provided by NSTAR. A new gas branch line was constructed by NSTAR to provide service to the Olin campus. It runs from the intersection of Great Plain Avenue and Olin Way, up Olin Way to the Olin Service Road, and then to the individual buildings. Each building is metered separately.

All of this work was paid for and completed by NSTAR.

Gas supply is provided by Amerada Hess Corporation.

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Witness Responsible: Stephen Hannabury

BE-1-26 Please describe the arrangements that Olin has made for the provision of cable television service to the Olin campus, identifying the provider of such service and the location of wires and other connections associated with the provision of such service.

Response: **Residential cable service is provided by AT&T to the building at 1735 Great Plain Avenue and from there to the temporary residence hall.**

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Witness Responsible: Stephen Hannabury

BE-1-27 To the extent not already supplied in response to other information requests, please describe the temporary facilities owned by Olin as set forth in paragraph 1 of the Petition. Please provide a map of the Olin campus that indicates the location of these temporary facilities and the name and function (e.g., academic, administrative, residential, etc.) of all buildings.

Response: See Response to BE-1-1.

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Witness Responsible: Stephen Hannabury

BE-1-28 To the extent not already supplied in response to other information requests, and with reference to paragraph 1 of the Petition, please describe in detail the facilities that are shared with Babson. Please provide a copy of any document, agreement, correspondence and/or memorandum between Olin and Babson regarding the use of such shared facilities. Please provide a map of both the Olin and Babson campuses that depicts the location and identity of all buildings and facilities.

Response: A map responsive to this request is filed as an attachment to the Response to BE-1-1. Extensive facilities and services are shared with Babson and such sharing will only expand in the future. Currently, Olin shares use of Babson's facilities for: recreational, dining, library and other academic activities; telecommunications service; electric service; custodial and maintenance services; human resources; risk management; financial services; public safety; student activities; purchasing and accounts payable; among others. The agreement governing sharing of certain facilities and services is filed as an attachment to the Response to BE-1-7.

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Witness Responsible: Stephen Hannabury

BE-1-29 With reference to paragraph 3 of the Petition, please provide any and all analyses performed by, or on behalf of, Olin that identify "the quality of electric service" required by Olin. Please explain the basis for Olin's belief that obtaining electric service from NSTAR Electric would involve "inefficiencies and additional costs."

Response: Olin has determined that it requires a very high level of reliability in its electric service in order to avoid: loss of data on computers of students and researchers at Olin; loss of potentially very extensive efforts in experiments in progress; and any number of other inconveniences that would result from interruption or undue variation in level of electric service and that would be inconsistent with the mission of Olin College to provide state-of-the-art and best practices in engineering education. The level of service reflected in Exhibit D to Olin's Petition is clearly inadequate for Olin's purposes. Another example is the 45 minute outage to Olin's facilities that are connected to the NSTAR Electric system that occurred on January 27, 2002.

Olin made repeated attempts to address this issue with NSTAR, including a request for NSTAR to install their own quality measuring devices. After many repeated requests and months of time, an NSTAR technician finally arrived to install the measuring device only to report that he did not have the correct device. He never returned.

Obtaining electric service from NSTAR Electric would involve the inefficiencies and additional costs of at least 1700 feet of on-campus distribution line more than would be required to take such service from WMLP. In addition, extensive off-campus work would be need to be done, as presented by NSTAR, to get the same level of reliable and redundant service to the edge of the Olin campus. The total cost differential, assuming a comparable level of reliability, between the WMLP and NSTAR alternatives for facilities only is \$1,740,000. Further, additional cost savings are projected to be available for electric supply for the next few years.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-30 Please identify Olin's understanding of what "portion of Olin's property on which Olin's main campus is being built is located in Town of Needham" (Petition at ¶3).

Response: See Response to BE-1-1.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-31 Please identify what is the "time frame [needed] to coincide with completion of construction of [Olin's] permanent campus facilities" (Petition at ¶3).

Response: See the Response to BE-1-17. In short, Olin plans to have its permanent campus facilities available for use beginning with the academic year in the Fall of 2002. Olin's preference is to have its permanent electric facilities in place at that time as well. To achieve that goal, a decision by the Department before July 1, 2002 will be most helpful.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-32 As referenced in paragraph 4 of the Petition, please identify the portion of the Babson campus that is located in Needham and Wellesley, and the portion of the Babson campus that is served by WMLP and NSTAR Electric.

Response: See Response to BE-1-1. The entire Babson campus, including the portion in Needham is, and has been for many years, served by WMLP. The portion of the Babson main campus in Needham comprises 1,691,382.85 square feet and three entire buildings, a portion of another building, a parking lot and a roadway – all of which use WMLP supplied electricity. Babson also owns three other pieces of real estate in Needham with approximately the same square footage.

The entire main Babson campus, including those portions in Needham, is served by WMLP. Babson owns some off-campus residences in Needham which are served by NSTAR.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-33 In paragraph 5 of the Petition, Olin describes “several temporary facilities now used for management of Olin’s new campus construction and limited use for interim residential and academic occupancy.” Please identify all of these facilities and the ownership of all such facilities. Please indicate for all such facilities whether they are located in Needham or Wellesley.

Response: In addition to the several construction trailers of the contractors, there are two trailer units leased by Olin. One is used for temporary residential purposes and the other is used for temporary classroom/faculty space.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-34 With respect to the distribution facilities described in paragraph 5 of the Petition:

- (a) Please describe these distribution facilities in detail, explain how these facilities are connected to Babson and where such facilities are located on Babson's property.
- (b) Does Babson own any of the facilities through which electric service is provided to the Olin campus? If so, please identify any and all of these facilities.
- (c) To the extent not already supplied in response to Information Request BE-1-1, please provide a map, graphic depiction or other form of diagram that identifies all such facilities and their ownership (whether by Olin, Babson or WMLP), including the location of any property boundaries between Olin and Babson and any associated municipal boundaries between Needham and Wellesley.

Response:

- (a) **The facilities are overhead wires attached to poles and connected to the network at the Babson switchgear. Their location is shown on the map provided with the Response to BE-1-1.**
- (b) **Babson owns the switchgear at which the WMLP lines terminate and to which lines owned by Olin are connected.**
- (c) **See Response to BE-1-1.**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-35 Please provide the calculations and projections (and any associated analysis) leading to the conclusion that the total capital cost for NSTAR Electric to supply service to Olin's campus would be between "\$1,140,000 and \$1,740,000" (Petition at ¶ 5). In responding to this information request, please provide all assumptions and the source of all such information, as well as Olin's calculation of the revenue credit that would apply under the circumstances and the basis for Olin's calculations.

Response: See Response to BE-1-38.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-36 Please provide the basis for Olin's assertion that "WMLP's distribution systems appear to provide greater reliability and would require no system upgrades" (Petition at ¶5). Please provide a copy of any and all reliability studies of WMLP's system: (a) as performed by Olin; and (b) as provided to Olin by WMLP.

Response: WMLP advised Olin that no system upgrades are needed. NSTAR advised Olin that system upgrades are needed. Olin understands that more of WMLP's distribution system is underground. Olin perceives that it experiences more frequent losses of power from NSTAR than Babson does from WMLP. Judging from the relative responsiveness of WMLP and NSTAR personnel, Olin believes that WMLP would more quickly address any service problems.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-37 With reference to paragraph 8 of the Petition, please provide any and all information that supports Olin's assertion that "taking electric service from WMLP...will be significantly less costly through a long term contract with WMLP...". Please provide a copy of any and all offers, proposals, counter offers and/or counter proposals between Olin and WMLP relative to a long-term contract for electric service.

Response: **See Attachment BE-1-8B**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-38 Please provide the basis for Olin's belief that the distribution facilities to serve Olin from WMLP would be shorter than those that would be required if Olin were served by NSTAR Electric (Petition at ¶9). Please provide Olin's understanding of which of these facilities would be shared with Babson, the cost of these facilities, and the basis for Olin's belief that Babson would share such cost. Insofar as not already supplied in response to other information requests, please provide the document or documents that establish that Babson "has agreed to such arrangement" (id.).

Response: See Attachment BE-1-38. In the attachment, "Option 1" is the on-campus cost to connect to NSTAR and "Option 2" is the on-campus cost to connect to WMLP.

See Response to BE-1-1, BE-1-29, BE-1-34, and BE-1-46. There is no cost to Olin for facilities in the public way should it take service from WMLP and the cost of facilities on private property is about \$140,000 less should Olin take service from WMLP. Thus, \$140,000 plus the cost of "NSTAR Option I B" (with the full revenue credit or none), yields the referenced estimate.

This proceeding makes the timing of such connection of Olin electric facilities with WMLP uncertain. Babson is planning to upgrade their underground utility infrastructure (power, data, stormwater, etc.). To the extent that the construction of the Olin conduit and manholes through the Babson campus can be coordinated with the Babson upgrades, there would be some mutual savings by performing the work simultaneously and sharing the appropriate portions of the cost (e.g. excavation and backfill, paving, etc.). The electric facilities will be wholly owned by Olin.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-39 Please identify the contact person or persons Olin has had with Babson on issues in the areas of:

- (a) electric service;
- (b) shared use of facilities;
- (c) contractual arrangements;
- (d) rights of way (i.e., easements, leases, licenses, etc.); and
- (e) scheduling.

Please provide the title, telephone number and address of such person or persons and all related correspondence.

**Response: John Eldert
Vice President for Planning
Babson College
Babson Park, MA 02457
781.239.5698**

**Shelley Kaplan
Associate Vice President for Planning and Facilities, Babson and Olin
Colleges¹
Babson College
Babson Park, MA 02457
781.239.5840**

**Jonathan Moll
Babson Counsel
Schnader Harrison Goldstein & Manello, P.C.
265 Franklin Street
Boston, MA 02110
617.439.8900**

¹ Mr. Kaplan has a joint appointment with both Babson and Olin.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-40 Please provide Olin's understanding of the "lead times associated with power cable order and implementation" and the basis of Olin's understanding (Petition at ¶10).

Response: Olin understands that lead times associated with obtaining switchgear can be six months or more, according to suppliers. Lead times for other components of the system are less, according to suppliers and contractors.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-41 Please provide any and all documentation relating to the agreement Olin has with Babson “for collaboration on obtaining a very wide range of services where economies to both educational facilities could result” (Petition at ¶11), including, but not limited to, a copy of the “joint RFP” issued by Babson and Olin for natural gas service.

Response: **See Response to BE-1-7 and BE-1-28.**

See Attachment BE 1-41 for the joint RFP for natural gas service.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-42 With respect to Olin's representation that WMLP serves a "subdivision along the Needham-Wellesley border" (Petition at ¶13), please explain Olin's understanding of whether NSTAR Electric has consented to that service from WMLP and the basis for Olin's understanding. Please identify any other electricity customers that Olin believes are located in Needham that are served by WMLP, where NSTAR Electric has not consented to such service by WMLP. Please provide all related documentation that forms the basis for Olin's belief.

Response: Olin is familiar with the filing in DTE 01-23. Further, it understands that the case was settled by an agreement whereby electricity is delivered by WMLP to NSTAR as the customer of record of WMLP, then NSTAR makes the retail sales in Needham. Further, Olin understands that except to the extent that WMLP's system is connected with that of NSTAR, this subdivision has no connection with the NSTAR system.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-43 Please provide a copy of Exhibit E referenced in paragraph 14 of the Petition.
Please provide a revised copy of Exhibit C with clear (or clearer) property lines
indicating the parcel(s) owned by Olin, Babson and others.

Response: As indicated to NSTAR counsel on November 13, 2001, the reference to an
Exhibit E was intended to be deleted because Exhibit C provided all the
referenced information. For a clearer map, see Olin College's Response to
BE-1-1.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-44 With respect to paragraph 17 of the Petition, please provide any and all documentation between Olin and WMLP indicating that WMLP “is ready, willing and able to serve the unserved portion of the Olin campus.”

Response: See Attachments BE-1-8A and BE-1-8B. WMLP has also indicated its readiness to serve many other times and has discussed the engineering equipment for such a connection with Olin.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-45 With respect to the temporary facilities served by WMLP, as referenced by Mr. Hannabury in paragraph 2 of his affidavit, please indicate whether it is Mr. Hannabury's understanding that NSTAR Electric has consented to such temporary service. Please provide any documentation on which Mr. Hannabury relies in relation thereto.

Response: Olin is not aware of any written consent by NSTAR. Olin does know that NSTAR was aware of such temporary service beginning in November, 2000 (see Attachment BE-1-45) – virtually the time of installation of such service. Although NSTAR clearly stated its position regarding its franchise rights at that time and subsequently it never suggested that Olin disconnect such temporary facilities or that NSTAR would take over such temporary service.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-46 Please provide a copy of any and all documentation relating to the five alternatives described in paragraph 4 of Mr. Hannabury's affidavit. Please provide any and all analysis performed by, or on behalf of, Olin relating to these alternatives.

Response: The only documentation that Olin has is the material provided by NSTAR. Such material is attached as Attachment BE-1-46. Olin's analysis of this material was primarily that only option #1B was sufficient for Olin's purposes and comparable to the service that would be available from WMLP.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-47 Please provide Mr. Hannabury's understanding of the level of revenue credit that Olin would be eligible to receive for capital cost upgrades needed to supply the Olin campus. Please supply all calculations and assumptions and indicate the source for all data.

Response: **Mr. Hannabury's only understanding regarding the revenue credit is that NSTAR representatives referenced the possibility of such a credit. Although Olin asked for the calculational methodology, NSTAR did not provide that. Nor did NSTAR provide any specific estimate of the revenue credit where Olin stated that its usage in the first several years of operation would be less than one-half of the total planned usage levels – except to note that a full \$600,000 would not be available.**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-48 With reference to the \$600,000 estimate for the private property described by Mr. Hannabury in paragraph 4 of the Petition, please indicate who is the owner of that property, the total acreage and/or length of property that needs to be crossed and the basis for the estimate of \$600,000.

Response: **There is no reference to a \$600,000 estimate in paragraph 4 of the Petition. To the extent the question intended to reference the Affidavit, please see Response to BE-1-5 and BE-1-38**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-49 Please identify the source of all data, assumptions and calculations relating to Mr. Hannabury's claim that the total capital costs of the private property portion of the connection to NSTAR Electric would be \$140,000 more expensive than the connection to WMLP (Hannabury Affidavit at ¶4).

Response: **See Response to BE-1-38.**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-50 Please provide a copy of the data on which Mr. Hannabury relies to support his statement that “WMLP’s distribution system historically provides significant reliability and would require no system upgrades” (Hannabury Affidavit at ¶4).

Response: **See Response to BE-1-36.**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-51 In paragraph 4 of Mr. Hannabury's affidavit, he claims that a connection to WMLP would "require no system upgrades as the WMLP connection to Babson already has a back-up line." Please calculate the total cost for WMLP to provide a primary and a back-up line to Olin in the event that Olin is unable to receive back-up service through Babson. Please identify any and all assumptions and calculations and indicate the source for all assumptions.

Response: The total cost of a connection to WMLP is as shown on Olin's Response to BE-1-48, which includes a primary and a back-up line.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-52 Please identify, and discuss the function of, the specific electricity-related facilities (e.g., lines, conduit, transformers, switches, etc.) that are (or will be) owned by: (a) Babson and (b) WMLP, through which electricity will be delivered to the Olin campus as described in paragraph 5 of Mr. Hannabury's affidavit (Note: please specify the ownership and discuss the function of all such facilities by Babson and WMLP separately). For each of Babson and WMLP, please identify the length of any such lines and the voltage of those lines. For each of Babson and WMLP, please specify the size and rating of all electric transformers and switchgear.

Response: **See Attachment BE-1-5.**

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-53 Please indicate the status of the "collaboration agreement" described by Mr. Hannabury in paragraph 8 of his affidavit. Has such an agreement been consummated? If so, please provide a copy of the agreement. If not, please identify the general business terms of the agreement and indicate when such an agreement is expected to be executed.

Response: The executed collaboration agreement has been filed as an Attachment to Olin's Response to BE-1-7. It is very possible that Olin and Babson will be expanding the areas of collaboration and possibly amending such agreement.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-54 Please provide the basis for Mr. Hannabury's claim that annual savings will range from \$400,000 to \$800,000 if Olin is authorized to take electricity service from WMLP. Please identify any and all assumptions and calculations and indicate the source for all assumptions.

Response: See Response to BE-1-37 above. While the analysis provided in that Response is now over twelve (12) months old, where the total price to be paid NSTAR per kwh exceeds \$0.10 and the price to be paid to WMLP is unchanged, the conclusion remains appropriate.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**OLIN COLLEGE'S RESPONSES TO BOSTON EDISON COMPANY'S d/b/a NSTAR
ELECTRIC FIRST SET OF INFORMATION REQUESTS**

Witness Responsible: Stephen Hannabury

BE-1-55 With respect to Exhibit D attached to Mr. Hannabury's affidavit, please provide technical specifications for the "UPS" equipment referenced in the attachment and provide the settings that were utilized in installing said equipment and in determining what conditions would lead to the triggering of an alarm response.

Response:

UPS information and operating parameters for server environment @ Olin.

UPS info:

- ?? American Power Conversion (APC)
- ?? SmartUPS 3000
- ?? SmartUPS 1400

Operating parameters snapshot from server MERCURY (Typical configuration for all UPS units)

- ?? High Transfer point: 132 VAC
- ?? Low Transfer point: 103 VAC
- ?? Sensitivity: High
- ?? Nominal UPS Output: 115 VAC

UPS Shutdown Parameters:

- ?? UPS low battery Signal Time: 5 minutes
- ?? UPS turn off delay: 20 seconds
- ?? UPS wakeup delay (time): 0 seconds
- ?? UPS wakeup delay (capacity): 15%
- ?? UPS audible warning: Powerfail
- ?? Automatic Reboot: Enabled